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9 TC Rich, LLC, Rifle Freight, Inc., Fleischer Customs Brokers, Richard G.  
10 Fleischer, and Jacqueline Fleischer

11  
12 **UNITED STATES DISTRICT COURT**  
13 **CENTRAL DISTRICT OF CALIFORNIA**  
14

15 TC RICH, LLC, a California Limited  
16 Liability Company, RIFLE FREIGHT,  
17 INC., a California corporation,  
18 FLEISCHER CUSTOMS BROKERS, a  
19 sole proprietorship, RICHARD G.  
20 FLEISCHER, an individual, and  
21 JACQUELINE FLEISCHER, an  
22 individual,

23 Plaintiffs,

24 v.

25 PACIFICA CHEMICAL,  
26 INCORPORATED, a California  
27 Corporation, AQUA SCIENCE  
28 ENGINEERS, INC., a California  
Corporation, A/E WEST  
CONSULTANTS, INC., a Nevada  
Corporation, and DOES 1 through 10,  
inclusive,

Defendants.

**AND ALL RELATED CROSS-ACTIONS**

Case No. CV 15-4878 DMG (AGRx)

*Assigned to the Hon. Dolly M. Gee*

**PLAINTIFFS' NOTICE OF  
MOTION AND MOTION FOR (1)  
MODIFICATION OF  
SCHEDULING ORDER AND (2)  
LEAVE TO FILE FIRST  
AMENDED COMPLAINT**

Hearing Date: April 19, 2019  
Time: 9:30 a.m.  
Courtroom: 8C

Action filed: June 26, 2015  
Discovery cut-off: None set  
Trial date: None set

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

Notice is hereby given that on April 19, 2019, at 9:30 a.m., or as soon thereafter as this Motion may be heard in Courtroom 8C of the above-entitled Court located at the United States Courthouse, 350 West 1st Street, Los Angeles, CA, 90012, Plaintiffs TC RICH, LLC, Rifle Freight, Inc., Fleischer Customs Brokers, Richard G. Fleischer, and Jacqueline Fleischer ("TC Rich," or "Plaintiffs") will and hereby move the Court for (1) modification of its Scheduling Order to allow for TC Rich to file a first amended complaint; and (2) leave to file a first amended complaint under Federal Rule of Civil Procedure 16(b); *Johnson v. Mammoth Recreations, Inc.*, 975 F.2d 604, 609 (9th Cir. 1992).

This motion is made following the conference of counsel pursuant to Local Rule ("L.R.") 7-3 that took place on February 22, 2019. This Motion is based on this notice; memorandum of points and authorities; declarations and exhibits attached thereto; and any other matters that may properly be considered in connection with this Motion.

Dated: March 21, 2019

**RAINES FELDMAN LLP**

By: 

JOHN S. CHA

Attorneys for Plaintiffs TC Rich, LLC, Rifle Freight Inc., Fleischer Custom Brokers, Richard G. Fleischer, and Jacqueline Fleischer